



# ANTI SEXUAL HARASSMENT INITIATIVE (ASHI)

POLICY AND GUIDELINES

*Providing a workplace that is safe, fair, and free of harassment.*

**Version 2.0**

Effective Date: 1 May 2026

## Foreword from the Managing Director

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TRL Krosaki Refractories Limited (TRL Krosaki) is committed to providing a place of work that is free of sexual harassment and all forms of intimidation or exploitation of women.

TRL Krosaki shall provide a healthy working environment that enables everyone to work without fear of prejudice, gender bias, sexual harassment and all forms of intimidation or exploitation. The Company believes that all stakeholders, irrespective of their gender, have the right to be treated with dignity.

In continuation with the Company's endeavour towards improved gender diversity and inclusion along with creating a safe, fair and just workplace, this policy, called **Anti Sexual Harassment Initiative (ASHI)**, is put in place.

In accordance with this policy, a Committee and detailed guidelines have been formed to deal with issues of sexual harassment of women in the workplace. All women employees (permanent, temporary, contract) as well as trainees, women visiting our office premises or women service providers are covered under this policy.

All are advised to refer to the guidelines on **Anti Sexual Harassment Initiative (ASHI)** and report to the **Internal Committee**, in case any act of sexual harassment against women employees comes to their notice.

Date: 01 May 2026

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(P. K. Naik)  
Managing Director

GUIDELINES

# Anti Sexual Harassment Initiative (ASHI) at Workplace

Effective Date: 01 May 2026

## 1. Introduction

TRL Krosaki is committed to providing a place of work that is free from sexual harassment and all forms of intimidation or exploitation of women.

The Company shall provide a healthy working environment that enables employees to work without fear of prejudice, gender bias, sexual harassment and all forms of intimidation or exploitation. The Company believes that all stakeholders, irrespective of their gender, have the right to be treated with dignity.

This policy seeks to provide protection against sexual harassment at the workplace and for the prevention and redressal of complaints of sexual harassment.

## 2. Objectives

- To set forth the expectations of conduct and mutual respect in the workplace about prevention of sexual harassment and the process of inquiry and complaint redressal if these expectations are not met or are violated.
- To clearly establish that TRL Krosaki is committed to creating a work environment free from all forms of discrimination and conduct which can be considered harassing, coercive, or disruptive, including sexual harassment.
- To identify a workable definition of sexual harassment in the workplace, explain the process of complaint if sexual harassment occurs and emphasize that anyone engaging in harassing conduct will be subject to disciplinary action ranging from a warning to termination of service or legal action.
- To outline the duties, responsibilities and rights of various stakeholders involved in the process.

## 3. Scope

- ASHI is applicable to all employees of the Company.
- All temporary, contract employees as well as trainees, women visiting the Company's office premises or women service providers are also governed by these guidelines.

## 4. Definitions

**Aggrieved Woman:** Any woman, whether employed or not, who alleges to have been subjected to an act of sexual harassment by the respondent. This would include visitors or guests in the workplace.

**Respondent:** A person against whom the aggrieved woman has made the complaint.

**Employee:** A person employed at a workplace for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.

**Employer:** Any person responsible for the management, supervision and control of the workplace and the person discharging contractual obligations with respect to his / her employees.

**District Officer:** Officer designated by the Government to exercise power or discharge functions under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

**Workplace:** In addition to the place of work, it extends to any place visited by the employee arising out of or during employment and includes transportation provided by the employer for undertaking such journey.

**Sexual Harassment:** The following behaviours are considered inappropriate within the Company's working environment and are liable for disciplinary action and legal action, if necessary.

**Physical Harassment, which includes:**

- Physical contact and advances.
- Intentional touching, pinching, grabbing, brushing against another's body.
- Sexual assault.
- Cornering, trapping or blocking another's pathway.
- Any physical conduct which is unwelcome.

**Written or Graphic Harassment, which includes:**

- Showing pornography.
- Display of pornographic material.
- Written communication that has sexual implications.
- Leering or staring at another's body and / or sexually suggestive gesturing.
- Displaying sexually visual material such as pinups, cartoons, graffiti, computer programmes, catalogues of sexual nature.

**Verbal Harassment, which includes:**

- A demand or request for sexual favours over promises related to employment such as work conditions, promotion, and increments. This is known as "quid pro quo" sexual harassment.
- Gesture-based harassment, e.g. sexually coloured remarks.
- Making sexually suggestive or off-colour comments, threats, slurs, sexual propositions.
- Sexual jokes or teasing, misogynist humour, sexually coloured gender-specific jokes.
- Sexual innuendoes and off-colour remarks.
- Comments about how someone looks, especially about parts of the body.

- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

**Circumstances that amount to sexual harassment:**

- Implied or explicit promise of preferential treatment in employment.
- Implied or explicit threat of detrimental treatment in employment.
- Implied or explicit threat about present or future employment status.
- Interferes with work or creates an intimidating, offensive or hostile work environment.
- Humiliating treatment likely to affect her health or safety.

## **5. Constitution of Internal Committee (IC)**

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The Company shall constitute an Internal Committee (“Committee”) at all its administrative units, comprising of 5 (Five) members by written order. The term of these members should not exceed 3 (Three) years from the date of their nomination. Guidelines for the formation of the Committee are given below:

- At least one-half of the IC members shall be women.
- The Chairperson of the Committee should be a lady employee at a senior level.
- Not less than two members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
- One member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment. She / He shall be paid such fees or allowances for holding the proceedings of the Internal Committee by the employer as may be prescribed in the Act or approved by the Company, whichever is higher.

*In case any member of IC is convicted for an offence or found guilty in any disciplinary proceedings or abuses his / her position, shall be liable to be removed from the Committee and accordingly, fresh nomination shall be made to fill the vacancy.*

## **6. Raising a Complaint**

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A complaint in writing can be raised by the affected person or by someone, who has witnessed the behaviour. In case the complaint is raised by someone who has witnessed the behaviour, the IC must ensure before proceeding in the matter that prima facie there is a case of sexual harassment against the Respondent. If an incident of this kind is brought to the notice of any employee (not necessarily the reporting manager of the respondent / affected person), he / she is responsible to communicate the same to the IC. The complaint must be made in writing to the Chairperson or any member of the Internal Committee within 3 months from the date of incident (last incident in case of series of incidents). The time frame of 3 months can be extended based on the nature of the case by the IC.

## 7. Redressal Process

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The Committee may, after making preliminary investigations into the matter, choose to issue an oral warning to the harasser and close the issue.

The aggrieved woman shall register a written complaint to the IC.

1. The IC would carry out an inquiry into the complaint received. For the purpose of this inquiry, it may nominate one or more persons from amongst its members to the Board of Inquiry.
2. All efforts should be taken to expedite the process and complete the inquiry as early as possible. The inquiry should be completed within a maximum of 90 days.
3. The IC has powers to:
  - a) Summon and enforce the attendance of any person and examine him / her on oath.
  - b) Require the discovery and production of documents.
4. Conclusions of the Committee will be informed to both the parties in writing.
5. The Committee shall ensure that victims or witnesses are not victimised or discriminated against while dealing with complaints of sexual harassment.
6. During the period of enquiry, based on a request from the victim, the IC may recommend the employer to:
  - a) Transfer the victim / respondent to another location / workplace.
  - b) Grant leave to the victim up to a period of three months (in addition to the leave otherwise entitled).
  - c) Grant any other relief as found suitable by IC.

*The employer is required to implement these recommendations and report it to the IC.*

7. Redress format (Annexure-1) should be completed by IC.

## 8. Recommendations by IC and Action

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On completion of the inquiry, the IC is required to provide a report of its findings to the employer within 10 days from the completion of the inquiry. The report is also to be made available to the concerned parties.

- If the allegation has not been proved, the IC recommends that no action is required to be taken in the matter.
- If the allegation has been proved, it is required to recommend to the employer:
  - To take appropriate action as per service rules.
  - To provide appropriate compensation to be paid to the aggrieved woman, which would be paid by the respondent / deducted from his / her salary.
- The determination of amount of compensation to be paid to the victim would be based on:
  - a) Mental trauma, pain, suffering and emotional distress caused to the aggrieved woman.
  - b) Loss in the career opportunity due to the incident of sexual harassment.

- c) Medical expenses incurred by the victim for physical or psychiatric treatment.
  - d) Income and financial status of the respondent.
  - e) Feasibility of such payment in lump sum or in instalments.
- The employer must act upon the recommendation within 60 days of receipt of the same.

## 9. Reporting Mechanism

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The IC is required to prepare an annual report and submit the same to the employer. The employer is required to include in its report the number of cases filed, if any, and their disposal in the annual report of the organisation.

## 10. False Claims

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Dealing with complaints of sexual harassment is a very sensitive matter and any allegations / complaints, however discreetly handled, could prove damaging for the person against whom it has been raised. Baseless allegations should therefore be strictly avoided.

In a case where a false complaint has been filed and the investigation has proved that the motivation of the complaint was purely to defame the respondent, disciplinary action will be initiated against the complainant and recorded in the personal file of the complainant. The action to be taken will be recommended by the Committee. Action can also be taken against a witness who provided false evidence or produced any forged or misleading document.

## 11. Awareness, Communication and Employer Duties

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The emphasis of the Company's policy against sexual harassment shall be preventive rather than prescriptive. In that vein, the Company will ensure that all its employees are aware of and fully understand the tenets and conduct requirements laid out in this policy. The employer is also required to:

- Display at conspicuous locations in the workplace, the penal consequences of sexual harassment, and the order constituting the IC.
- Regularly organise workshops and awareness programmes to sensitise the employees to the provisions of the Act and orientation programmes for the members of the IC.
- Provide necessary facilities to the IC to deal with the complaint and conduct an enquiry.
- Assist in securing the attendance of the respondent and witnesses before the IC.
- Make available required information to the IC.

## 12. Prohibition of Publication

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The contents of the complaint, identity and addresses of the victim, respondent and witnesses, any information relating to inquiry proceedings, recommendations of the IC, and the action taken by the employer are not to be published, communicated or made known to the public, press and media. However, information

may be disseminated regarding the justice administered to any victim of sexual harassment without disclosing the name, address, identity or any other particulars which may lead to the identification of the victim and witnesses.

### **13. Statutory Compliance**

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The above policy is aimed at complying with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules made thereunder.

### **14. Annual Acknowledgement**

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All employees and stakeholders shall be required to provide an online annual acknowledgement, with e-signature, confirming that they have read, understood, and agree to abide by the Anti-Sexual Harassment Initiative (ASHI) – Policy and Guidelines of the Company. New joiners shall provide such acknowledgement at the time of induction / onboarding.

### **15. Review and Amendment**

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The Management shall review the Policy on an annual basis and revise the same, if required, to keep the Policy updated with necessary legal and internal changes.

This Policy shall come into effect from 01 May 2026 and supersedes the previous Policy.

## Redressal Form

To be completed by the Internal Committee

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Date

Name of Complainant

Name of Defendant

Complaint

Action Initiated

Investigation Report

Date:

Summary:

Committee Decision




## Anti Sexual Harassment Initiative (ASHI)

Policy and Guidelines — Document Control

### Revision History

Version	Date	Description of Change	Author	Reviewed By	Approved By
1.0	01.01.2015	Original	TRL Krosaki	Dr. Tarapada Dash	Managing Director
1.1	01.07.2023	Provision of removal of IC member added.	Dr. Tarapada Dash	Dr. Tarapada Dash	Managing Director
1.2	01.05.2026	Change of Signatory, i.e. Managing Director.	Dr. Tarapada Dash	Dr. Tarapada Dash	Managing Director
2.0	01.05.2026	New clause on "Annual Acknowledgement" added.	Mr. K H N Naik	Mr. K H N Naik	Managing Director

### Review and Approval Matrix

	Authored By	Reviewed By	Approved By
Signature			
Name	Mr. K H N Naik	Mr. K H N Naik	Mr. P. K. Naik
Designation	VP (Digital Transformation and ICT) and Ethics Counsellor	VP (Digital Transformation and ICT) and Ethics Counsellor	Managing Director
Date	21.04.2026	01.05.2026	01.05.2026